

UNITED STATES DISTRICT COURT  
DISTRICT OF NEBRASKA

**PATRICIA J. DAVIS, an Individual, and  
PATRICIA A. DUNCAN, an Individual,**

**Plaintiffs,**

**v.**

**J. JOE RICKETTS, an Individual, HUGO  
ENTERPRISES, LLC, f/k/a RICKETTS  
ENTERPRISES, LLC, a Nebraska  
Limited Liability Company,  
OPPORTUNITY EDUCATION  
FOUNDATION, an Iowa Non-Profit  
Corporation, and ADP TOTALSOURCE,  
INC., a Florida Corporation,**

**Defendants.**

**Civil Action No: 8:11-CV-00221-FG3**

**CORPORATE DISCLOSURE  
STATEMENT OF DEFENDANT HUGO  
ENTERPRISES, LLC, f/k/a RICKETTS  
ENTERPRISES, LLC**

**DISCLOSURE OF CORPORATE AFFILIATIONS,  
FINANCIAL INTEREST, AND BUSINESS ENTITY CITIZENSHIP**

Pursuant to Federal Rule of Civil Procedure 7.1 and *GMAC Commercial Credit LLC v. Dillard Department Stores, Inc.*, 357 F.3d 827, 828 (8th Cir. 2004), Defendant Hugo Enterprises, LLC f/k/a Ricketts Enterprises, LLC makes the following disclosures concerning parent companies, subsidiaries, partners, limited liability entity members and managers, affiliates, and similar entities, as well as unincorporated associations or similar entities.

- ☐ This party is an individual.
- ☐ This party is a publicly held corporation or other publicly held entity.
- ☐ This party has parent corporations

If yes, identify all parent corporations, including grandparent and great-grandparent corporations:

- ☐ Ten percent or more of the stock of a party is owned by a publicly held corporation or other

publicly held entity.

If yes, identify all such owners:

☐ Another publicly held corporation or another publicly held entity has a direct financial interest in the outcome of the litigation.

If yes, identify all corporations or entities and the nature of their interest:

☒ This party is a limited liability company or limited liability partnership.

If yes, identify each member of the entity and the member's state of citizenship:

J. Joe Ricketts, Wyoming.

☐ This party is an unincorporated association or entity.

If yes, identify the members of the entity and their states of citizenship:

Dated: Omaha, Nebraska  
August 17, 2011

Respectfully submitted,

By: Local Counsel: s/Heidi A. Gutttau-Fox  
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*Attorneys for Defendants J. Joe  
Ricketts, Hugo Enterprises LLC and  
Opportunity Education Foundation*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 17th day of August, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

Michael J. Merrick

Chad P. Richter

And I hereby do certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

None.

s/Heidi A. Guttan-Fox